

Individual community member comments:

Dear Multnomah County Office of Sustainability Staff,

I am writing to let you know that global warming is my greatest concern-in a world full of many reasons to be fearful. As you know so well, global warming is on track to threaten the world economy, political stability and in fact all life forms on earth. It is well that you have engaged in the recent 12 community forums about the Climate Justice Plan to listen to the priorities of the community and develop a plan to protect the interests in the whole community. I applaud your efforts.

Sincerely,
Joan

Thank you for the opportunity to comment on the Climate Justice Plan. I fully support the plan. It will benefit the city by reducing air and water pollutants. It will also benefit the state and country by setting an example for other jurisdictions. Finally, it will benefit the people by supporting their rights and preventing the unintended exploitation of our neighbors.

As we move to clean energy we can all benefit if we rethink our current behaviors and business models. I completed my Climate Reality Leader training with Al Gore, in 2016 and was impressed by the maps showing pollution levels alongside racial and economic status by ZIP code. It is not too hard to grasp that people who can afford to live elsewhere will not choose polluted neighbors with toxic air. I am also a member of Mobilizing Climate Action Together (MCAT), which Oregon League of Conservation Voters sponsors. My opinions are my own; I mention the groups only to illustrate that I have studied multiple attempts to legislate clean energy solutions. The Climate Justice Plan is particularly important to help us avoid unintended consequences while shifting to clean energy.

I also see a challenge in sticking to this plan as we transition from fossil fuels to clean energy, primarily wind and solar. Electricity will require building additional solar and wind turbine installations and there has been much discussion about upgrading the electrical transmission grid. All of this will require upfront investment. Upgrading homes and buildings to all-electric is not inexpensive. In 2020, after the Clean Energy Bill HB 2020 died in the Senate I converted to all electric. It cost as much as a new gas system but I could not wait for my gas furnace to age out. I had the resources to do this, even though I had only installed the gas furnace in 2012.

As the population of former gas customers increases there will be fewer gas users. Under our current model I think gas companies will raise rates. This will burden those who have not had the resources to upgrade to electric. It may also, eventually put the gas company out of business.

However, several states have implemented programs to transition gas companies into heating and cooling companies that use underground heat pump systems. [1](#)

I hope Portland and NW Natural Gas will adopt this model since we know that in the short term, methane gas is 80% more potent than CO2 in creating warming. [2](#)

Jane

Please no data centers in Climate Plan - people don't like AI.

Please no fossil fuels in Climate Plan - people don't want global warming.

Sincerely,
Geert

I attended and spoke briefly at the May 19 meeting your staff hosted on the Climate justice Plan. Here is a more complete sharing of what I think the CJP Board and Office of Sustainability should prioritize in presenting the plan to the County Commissioners. In light of existing severe budget limitations at every level of government and the County's stated commitment to practicing targeted universalism, prioritize the following: Ongoing processes for citizen input into policy decisions including: Land-use air quality compatibility process / environmental justice zoning. Expand community involvement around land use/zoning reformation and strengthen the County's land use planning. Expand funding and support for frontline communities to participate in climate justice planning. Support efforts by at-risk and energy-burdened communities to influence decision-makers on energy rates and other energy-related policy issues. Support fossil fuel infrastructure engagement campaigns, including community-led community health/environmental justice research. Policies and services specifically targeting marginalized communities including: Invest in low-income weatherization and energy efficiency services, plus home repairs. Prioritize solar and battery storage for low-income households. Increase funding for culturally specific weatherization and home repair programs. Prioritize resilience investments in neighborhoods with greater vulnerability and need. Evacuation plans and plans to accommodate an influx of climate migrants. Expand community-owned gardens at housing developments, prioritizing affordable housing communities. Advocate for Indigenous control over state and local lands in Multnomah County, especially in usual and accustomed areas for food gathering like Sauvie Island. Expand access to healthy foods by supporting new neighborhood grocery stores including small and diverse businesses, food pantries, community supported agriculture (CSA) and innovative approaches like mobile grocery stores. Increase funding, training, and support for those serving people experiencing homelessness. Support training of healthcare professionals about climate interventions and technology to support Medicaid patients. Develop more permanently affordable housing. Fully fund rent assistance. Prohibit industrial and toxic operations, including distribution centers and manufacturing facilities, from being developed near

affordable housing and/or areas with disproportionately high population of BIPOC communities. Identify parks in greatest need of investment based on existing amenities and demographic characteristics of the surrounding community, and work to increase funding to develop and maintain parks in communities with the least access to quality parks and green space. Establish community orchards in communities with high proportions of BIPOC residents. Fund pavement removal and tree planting in heat island areas. Implement fare-free transit all the time for specific routes (similar to Boston). As an alternative, expand access to low-income fare and move youth fare from half-price to zero. Provide incentives and reimbursements to property owners and developers to build and improve existing pedestrian infrastructure that is ADA accessible (e.g., sidewalks and crosswalks).

Michaela

As part of the goal for affordable green energy for all households, Multnomah County should create a public utility district oriented towards affordable green power and kick pge and pacific power out of our county with their price gouging ways. We don't need a ceo making \$20 million while shutting off record numbers of people's power and arguing to the puc that they still need to raise prices more. We have the chance to do better!

Thank you for your consideration.

Sincerely,
Tania

Just a comment to say this looks incredible and you all did an amazing job! Such great work incorporating feedback from community members and turning it all into something real and actionable.

-Elayna

Hello,

My only piece of feedback at this point is that I'd like to see a more detailed plan for how green job initiatives are funded, promoted, and enacted. As someone who has worked in renewable energy (solar)- the industry was extremely volatile and competitive, so I'd like to know how the committee plans to address the inherent challenges in the green industry.

Thank you!

Joshua

Hello,

I am pleased to see the plans for the Climate Justice Plan coming together. I was not able to attend meetings, but I wanted to submit my comment in support of a strong plan. Outside influence from fossil fuel companies like NW Natural should not be considered, as they do not have our best interests in mind. Our community deserves a plan that is built for the people, by the people. Safety, health, and community benefit should stay at the center of all planning. I appreciate the education on healthy communities being included, and support the development of outreach materials to better inform them. Our water and air need help being cleaned up for the betterment of current and future generations in the face of climate change, and it starts at the local level. Please proceed with a strong plan that attacks each justice issue present in the area with careful consideration of the communities affected most and provides equitable solutions to address them.

Thank you,
Laurel

To Multnomah County Office of Sustainability:

Thank you for engaging the public to develop a comprehensive climate action plan for the county. I am writing to express enthusiastic support for this plan as a resident of Multnomah County and also as an advocate for strong policies and voluntary actions to reduce the consumption of fossil energy and replace that with clean energy generation and electrification of end uses.

The draft Climate Action Plan includes sensible measures to reduce air and carbon pollution while also increasing the resilience of our community and lowering energy burdens.

I urge the county commissioners to adopt this plan and resist the self interested opposition from NW Natural and the fossil fuels industry.

Brian

Organization comments:



May 19, 2026

Multnomah County Office of Sustainability

501 SE Hawthorne Blvd, #600
Portland, OR 97214

Re: Feedback on Revised Climate Justice Plan (Goals & Strategies)

On behalf of BOMA Oregon, we appreciate the opportunity to provide written testimony on the proposed Climate Justice Plan. BOMA Oregon represents the commercial real estate (CRE) industry across the region, including office, industrial, retail, and mixed-use properties that serve as critical infrastructure for businesses, services, and community activity.

We support the Plan's overarching goals to reduce greenhouse gas emissions, improve public health, and advance equitable outcomes. Commercial property owners are already investing in energy efficiency, building upgrades, and broader sustainability initiatives. At the same time, several proposed strategies raise serious concerns related to **feasibility, cost, infrastructure readiness, and unintended economic impacts**.

For that reason, we offer the following comments on several areas where the Plan, as drafted, could undermine both climate progress and the economic stability of the communities it is intended to benefit.

Key Concerns

1. Electrification, Gas Transition, and Building Systems

First, the Plan includes strategies to develop NOx emissions standards for gas appliances, accelerate building electrification, and limit the growth of the natural gas system.

Although these are significant policy directions, they do not yet adequately reflect the operational realities of commercial buildings.

Commercial real estate operates on long capital planning cycles, with major building systems replaced over decades. **Accelerated or inflexible mandates would impose substantial, unplanned capital costs, particularly for existing and older buildings.**

As a result, the likely consequences include increased operating costs passed through to tenants, reduced reinvestment in aging building stock, and potential market dislocation and asset devaluation.

To be viable, these policies must include phased implementation aligned with equipment end-of-life cycles, flexible compliance pathways for building specific constraints and clear recognition of technical and financial feasibility limits.

2. Cost Burden Without Defined Funding Mechanisms

Closely related to these implementation concerns, multiple strategies—including those addressing indoor air quality improvements, equipment upgrades, and building performance—place primary responsibility on property owners without identifying sufficient funding support.

The Plan correctly acknowledges affordability challenges yet **does not provide a clear framework for how required upgrades will be financed.**

Without meaningful financial support, these costs will likely be passed on to tenants, including small businesses and nonprofits, which could reduce access to affordable commercial space and disproportionately affect underperforming and older buildings.

To avoid these outcomes, the County **must ensure that incentives, grants, and financing programs are established prior to mandates taking effect, while also ensuring that technical assistance is available for smaller property owners.**

3. Land Use, Siting Policies, and Industrial Impacts

Beyond building operations, the Plan also proposes exploring environmental justice criteria in land use decisions and “indirect source rules” for facilities such as warehouses and freight hubs.

These strategies could significantly affect industrial and commercial development, including logistics and distribution facilities, as well as data centers and employment-generating uses.

While equity considerations are essential, it is critical that new requirements provide **clear, objective, and predictable standards**, avoid duplicative or conflicting regulatory frameworks and be evaluated for **economic and regional competitiveness impacts.**

Absent that clarity, these policies risk constraining investment and shifting economic activity outside the County.

4. Energy Costs, Grid Capacity, and System Readiness

These concerns also extend to energy supply and system readiness. The Plan recognizes rising energy costs and increasing demand driven by electrification and large-scale users. At the same time, it proposes accelerating electrification across multiple sectors. However, it does not sufficiently address **grid capacity and infrastructure readiness**, reliability risks during peak demand, or long-term energy cost impacts for commercial customers.

A successful transition requires coordinated planning with utilities to ensure that electrification goals are supported by reliable and resilient infrastructure, stable and predictable energy pricing with adequate generation and transmission capacity.

Economic and Equity Implications

Taken together, these issues point to broader economic and equity implications. While the Plan is grounded in climate justice principles, unfunded mandates and accelerated requirements risk producing **unintended equity impacts**, including **increased rents, and operating costs**, reduced availability of affordable commercial space, and negative impacts on small businesses, service providers, and community-serving organizations.

Implementation Gaps

Just as importantly, many strategies are identified as areas for research or future development but lack clear timelines, defined compliance frameworks, and identified funding sources. Greater specificity is needed to ensure both accountability and feasibility.

Recommendations

In light of these concerns, BOMA Oregon recommends the following steps to ensure the Climate Justice Plan is both effective and implementable:

1. **Align timelines with real-world building and capital cycles.**
2. **Pair all regulatory requirements with funding mechanisms prior to implementation.**
3. **Provide flexibility through alternative compliance pathways and exemptions where appropriate.**
4. **Coordinate closely with utilities on grid readiness, reliability, and cost impacts.**
5. **Engage the commercial real estate industry as an ongoing implementation partner.**

In conclusion, BOMA Oregon supports the intent of the Climate Justice Plan, but successful implementation will depend on aligning environmental goals with economic realities and operational feasibility.

Without these adjustments, several proposed strategies risk creating unintended consequences that could undermine both climate objectives and community stability.

With that in mind, we welcome continued collaboration with Multnomah County to refine these policies and ensure they are both ambitious and achievable.

Sincerely,

BOMA Oregon



Sophia Steele Conley

Senior Manager, Northwest Government Affairs

501 SE Hawthorne Blvd
Portland, OR 97214

Email sustainability@multco.us

May 31, 2026

Re: Multnomah County Air Quality Environmental Justice Plan

Dear County Commissioners,

The Western States Petroleum Association (WSPA) appreciates the opportunity to provide comments on the Multnomah County Climate Justice Plan (Plan). WSPA recognizes the significant effort that went into development of the document and supports Multnomah County's broader goals of improving public health, environmental outcomes, and community resilience.

WSPA is a non-profit trade association that represents companies that safely explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California, Washington, Oregon, Nevada, and Arizona. Our members operate industrial facilities in Multnomah County and may become affected by the proposed plan.

Air Quality and Proportionate Share

We appreciate the Plan recognizes that air quality and environmental health burdens arise from a complex interaction of factors, like wildfire smoke and residential wood combustion. However, we are concerned that several portions of the Plan move from a nuanced description of environmental burdens to policy conclusions that appear to presume industrial or freight-related land uses are primary contributors to localized air quality impacts without corresponding proportional source analysis. It is our understanding that environmental justice, or, frankly any policy, is strongest when the root cause of a concern is well understood.

We'll use PM2.5 source apportionment work conducted by Alpine Geophysics for the Multnomah County area, Appendix A. Before getting into that discussion, it is important to pause and recognize that air quality discussions can easily sound alarming when presented without context. The modeled values discussed in these analyses are often very small fractions of overall ambient concentrations, and human health impacts are influenced by a complicated mix of factors including total exposure over time, indoor environments, wildfire smoke, personal health, smoking, occupational exposure, wood burning, and countless other day-to-day conditions.



As the attached data shows, residential wood combustion is often the dominant contributor to annual PM_{2.5} concentrations, outside of major wildfire events. Many other source categories contribute small fractions of overall monitored concentrations; with the more prominent (though still small) sources including the commercial cooking (grilling) and international boundary conditions. Industrial and freight activity is very small by comparison.

Proximity does matter in terms of source for PM_{2.5} in particular; the data shows, however (appendix A, page 7), that fine particle emissions settle very short relative distances to location. Thus, a homeowner in Multnomah County will receive benefits if either their own home or their neighbors' home switch to a heat pump system. Increasing the financial aid in that process will benefit those community members.

It's important to understand that proportional contribution matters. If one source category is contributing a large share of PM_{2.5} in a community, and another source category is contributing a very small incremental amount, focusing on the de minimis source won't have the same value or impact as focusing on the source that contributes the larger share; and those two situations should not be treated the same from a policy perspective. That is why source apportionment analysis is important, as it helps separate assumptions from actual contribution.

While this approach may be less politically compelling, we believe effective policy should be grounded in meaningful outcomes that improve people's day-to-day lives.

Environmental Justice Plan Suggested Strategies

Some of the suggested strategies (indirect source rules, environmental justice land use screening, and/or restrictions on industrial and freight activities) operate within existing state and federal regulatory structures and are subject to extensive permitting, emissions controls, monitoring and operational requirements. These existing requirements are not well described in the Plan and are important to explain, even if just in an appendix, to allow clearer analysis on investments made by Multnomah County and policy issues managed effectively at the state or federal level.

Industrial and freight activity support essential regional functions and are already subject to extensive permitting, emissions control, monitoring, and operational requirements under state and federal law.

Response to Strategy: Regulate liquid fuel storage facilities not currently covered by the DEQ Fuel Tank Seismic Stability Program

WSPA members are covered entities in the DEQ Fuel Tank Seismic Stability Program, and therefore we have no comment related to that recommendation.

WSPA and other industrial associations were not invited to provide information in the assessment pertaining to the *2023 Multnomah County report Risk of Earthquake-Induced Hazardous Materials Releases* and other materials¹. Our members may provide valuable insights regarding an extensive understanding of the state and federal regulatory environment, engineering standards and other technical details that may inform sound public policy.

Below are two primary considerations we identified in the document, and our recommendations:

Scenario Assumptions in the Toxic Inhalation Report:

The toxic inhalation report titled *“Risk of Earthquake-Induced Hazardous Materials Releases in Multnomah County, Oregon: Two Scenarios Examined”* assumes a simultaneous failure of all containment systems at the Critical Energy Infrastructure (CEI) Hub without accounting for existing safety systems and protocols. Such assumptions can be reasonably expected to overstate risks, potentially inciting undue public fear while not reflecting realistic scenarios. Empirical data from incidents involving areas with multiple chemical facilities suggest outcomes that differ significantly from the predictions in the report.

- **Recommendation:** The proposed report should prioritize a probabilistic risk assessment approach. This includes evaluating the likelihood of such catastrophic failures and grounding analyses in scenarios that incorporate current regulatory measures, safety protocols, and historical data from comparable incidents.

Prioritization of Chemicals in the Report:

The report addresses all toxic chemicals uniformly rather than focusing on those with the greatest potential for acute inhalation hazards, such as ammonia and chlorine. This broad focus may contribute to heightened community concern, potentially disproportionate to the actual risk of severe toxic inhalation events.

- **Recommendation:** Consider refining the report to prioritize high-potential inhalation hazards, emphasizing chemicals of acute concern during emergencies. Analyses should account for both the likelihood of exposure and the potential severity of health impacts alongside existing regulatory frameworks and mitigation strategies.

WSPA respectfully recommends that future implementation efforts prioritize:

¹ We note, as well, that the cover of the assessment had a highly inflammatory image of closed/non operational site, implying that existing and active operations conduct business in a manner that would imply gross misconduct. Our members site operations are typically clean and well-maintained.



- Activities that can result in measurable public health outcomes;
- Coordination with existing Clean Air Act programs and state regulatory structures;
- Evaluation of cumulative economic and infrastructure impacts; and
- Policies that target the largest contributing emissions sources first.

Communities deserve environmental policies that are analytically rigorous. Environmental justice objectives are best advanced through approaches that are evidence-based, legally durable, calibrated to actual emissions contribution, result in measurable health outcomes, and protect Oregonians from uncontrolled cost impacts.

Thank you for the opportunity to provide comments on the Plan and for consideration of these perspectives. WSPA appreciates the County's engagement in these important issues and looks forward to continued dialogue.

If you have any questions regarding our comments, please contact me directly at (360) 352-4516 or via email at ssteele@wspa.org.

Sincerely,

A handwritten signature in black ink that reads "D. Steele". The signature is written in a cursive, flowing style.

Sophia Steele Conley

Attachment A. Alpine Geophysics. Memo: *PM 2.5 Source Apportionment Results for Monitor 410510080 in Multnomah County, OR. 26 May 2026*

TECHNICAL MEMORANDUM

To: Western States Petroleum Association

From: Alpine Geophysics, LLC

Date: 26 May 2026

Re: PM_{2.5} Source Apportionment Results for Monitor 410510080 in Multnomah County, OR

In early 2024, Alpine Geophysics, LLC (Alpine) ran a particulate matter source apportionment run¹ with thirty-nine (39) tagged emission categories using EPA's 2016v3 modeling platform projections to 2026. This simulation allowed for the calculation of relative contribution of specific PM_{2.5} species from each of the tagged categories to the modeled PM_{2.5} concentrations at downwind receptors.

Below we present a summary of this modeling for monitor 410510080 in Multnomah County, Oregon with overall and top ten category contribution tables and figures. We also summarize EPA's and Alpine's findings that in most regions in the United States, proximal emissions dominate the modeled PM_{2.5} concentration found at PM_{2.5} monitors which is consistent with National Ambient Air Quality Standard (NAAQS)² exceedances being driven by the urban PM_{2.5} increment as documented in EPA's RIA.

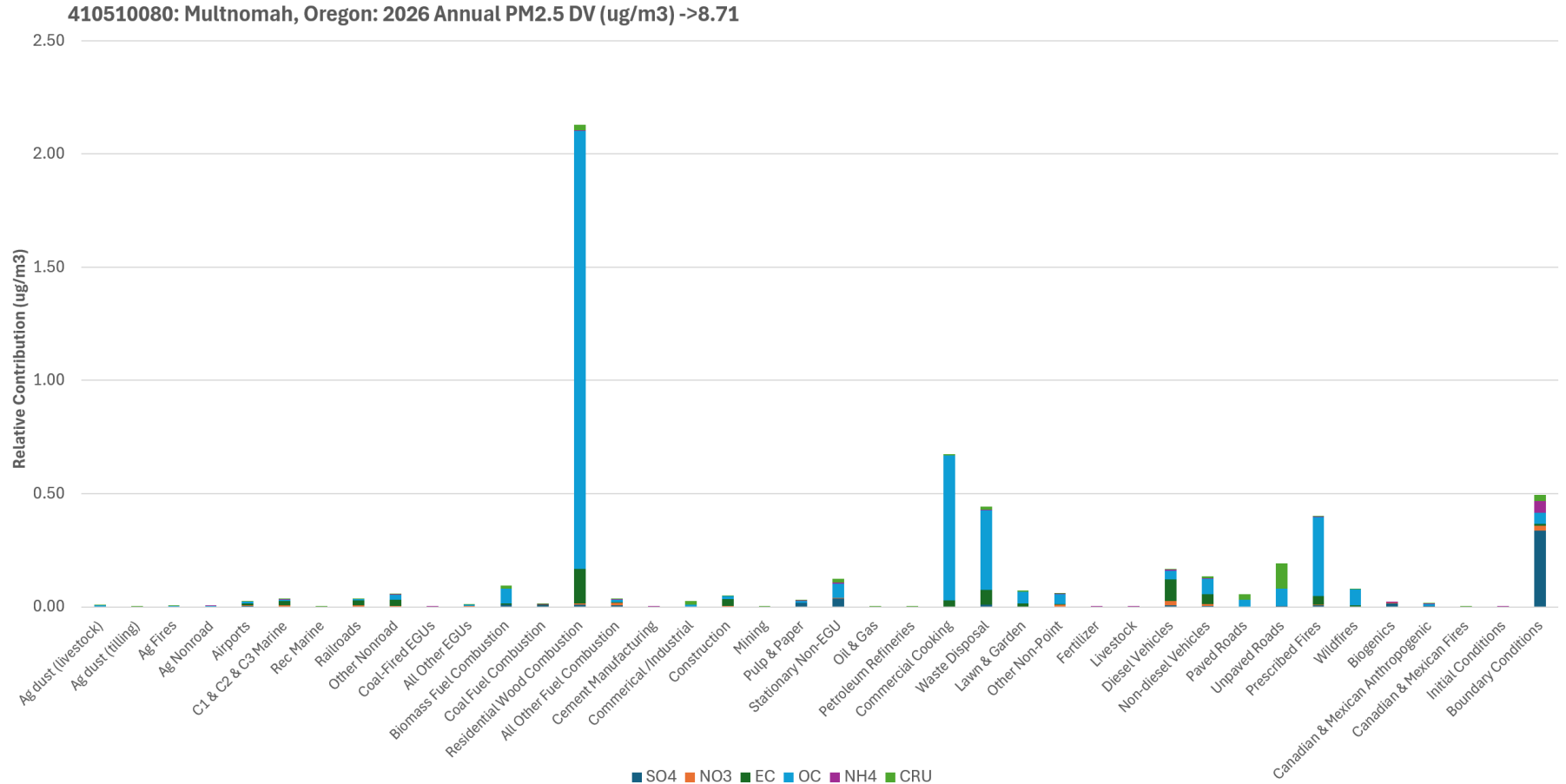
We also note the low responsiveness of PM_{2.5} concentrations to primary PM_{2.5} emission reductions the farther the source of emissions to the monitor as documented by EPA in its assessment that adjacent county control of primary PM_{2.5} emissions is four times less responsive than the value used when applying in-county emissions reductions.

¹ https://www.midwestozonegroup.com/_files/ugd/7ec07f_744eb1e14e444b2b93dff141fadee7b8.pdf

² Primary NAAQS standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly with an adequate margin for safety.

Monitor 410510080 – Multnomah County, OR

Multnomah County has one monitor that is currently attaining ($6.2 \mu\text{g}/\text{m}^3$; 2022-2024 annual $\text{PM}_{2.5}$ design value) and is projected in the 2026 base case to be in attainment of the $9.0 \mu\text{g}/\text{m}^3$ primary health-based NAAQS. Monitor 410510080 has a modeled 2026 base case annual $\text{PM}_{2.5}$ design value of $8.71 \mu\text{g}/\text{m}^3$. The relative contribution of tagged $\text{PM}_{2.5}$ species from each of the categories to this monitor is presented below. The relative height of each bar represents the relative contribution of that category to the overall modeled $\text{PM}_{2.5}$ concentration.

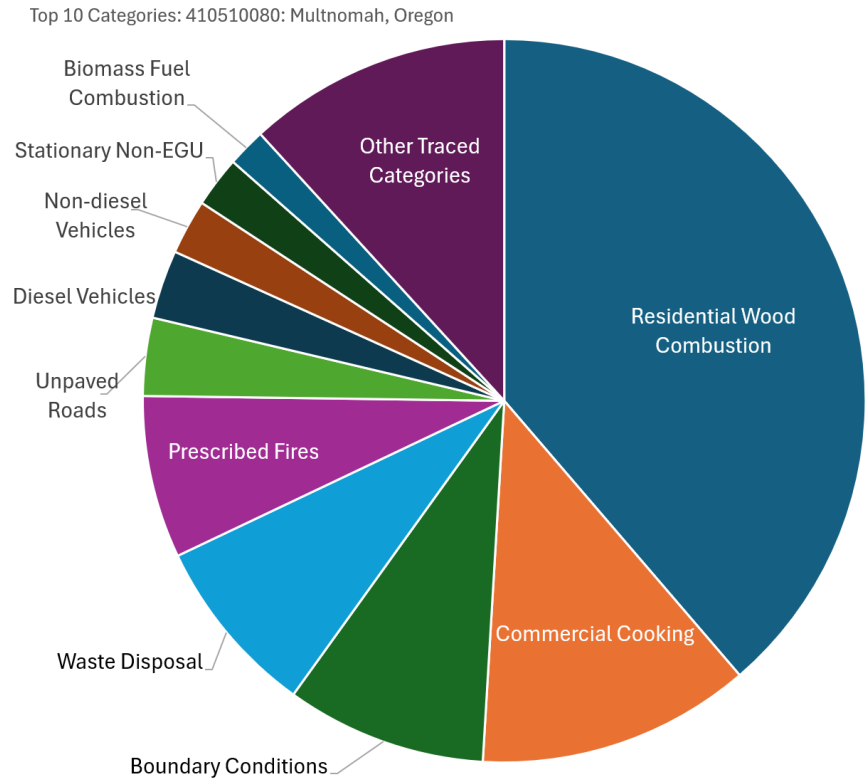


Top Ten Categories

From the thirty-nine categories tagged in the simulation, the top ten categories contributing to this monitor are listed by category and tagged species in the table and pie chart below. These figures and tables may provide information valuable in determining upwind source categories that would have greatest potential for incremental control in helping to maintain attainment with the NAAQS at this location.

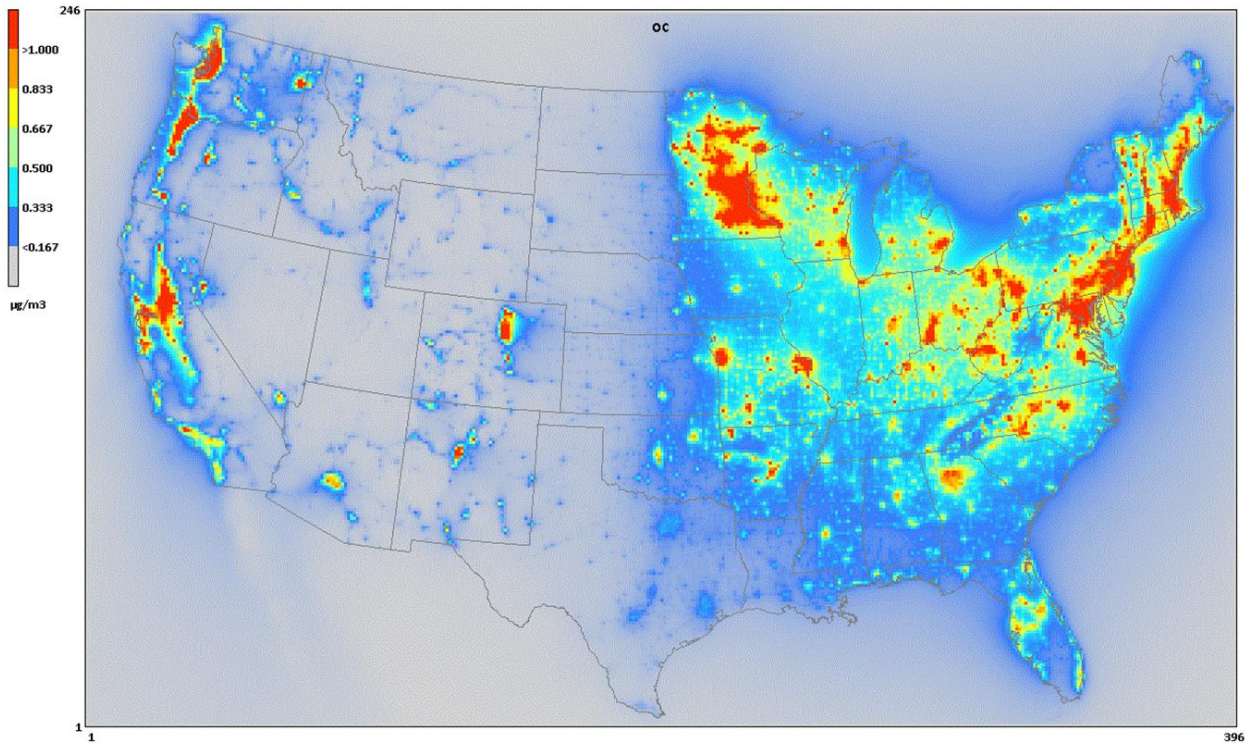
410510080: Multnomah, Oregon		2026 Annual PM2.5 DV (ug/m3) ->						8.71
Relative Traced Species Contribution (ug/m3)								
Top 10 Categories	Species Total	SO4	NO3	EC	OC	NH4	CRU	
Residential Wood Combustion	2.129	0.010	0.004	0.153	1.935	0.003	0.025	
Commercial Cooking	0.673	0.001	0.001	0.026	0.640	0.000	0.005	
Boundary Conditions	0.493	0.337	0.023	0.007	0.050	0.051	0.026	
Waste Disposal	0.442	0.009	0.001	0.065	0.352	0.002	0.013	
Prescribed Fires	0.400	0.008	0.003	0.036	0.350	0.002	0.001	
Unpaved Roads	0.191	0.004	0.000	0.001	0.075	0.001	0.111	
Diesel Vehicles	0.169	0.006	0.020	0.095	0.038	0.007	0.003	
Non-diesel Vehicles	0.135	0.004	0.007	0.044	0.069	0.003	0.008	
Stationary Non-EGU	0.125	0.038	0.002	0.001	0.060	0.006	0.018	
Biomass Fuel Combustion	0.095	0.008	0.001	0.005	0.065	0.001	0.013	

SO4 = Particulate Sulfate
 NO3 = Particulate Nitrate
 EC = Elemental Carbon
 OC= Organic Carbon
 NH4 = Ammonium
 CRU = Crustal Material



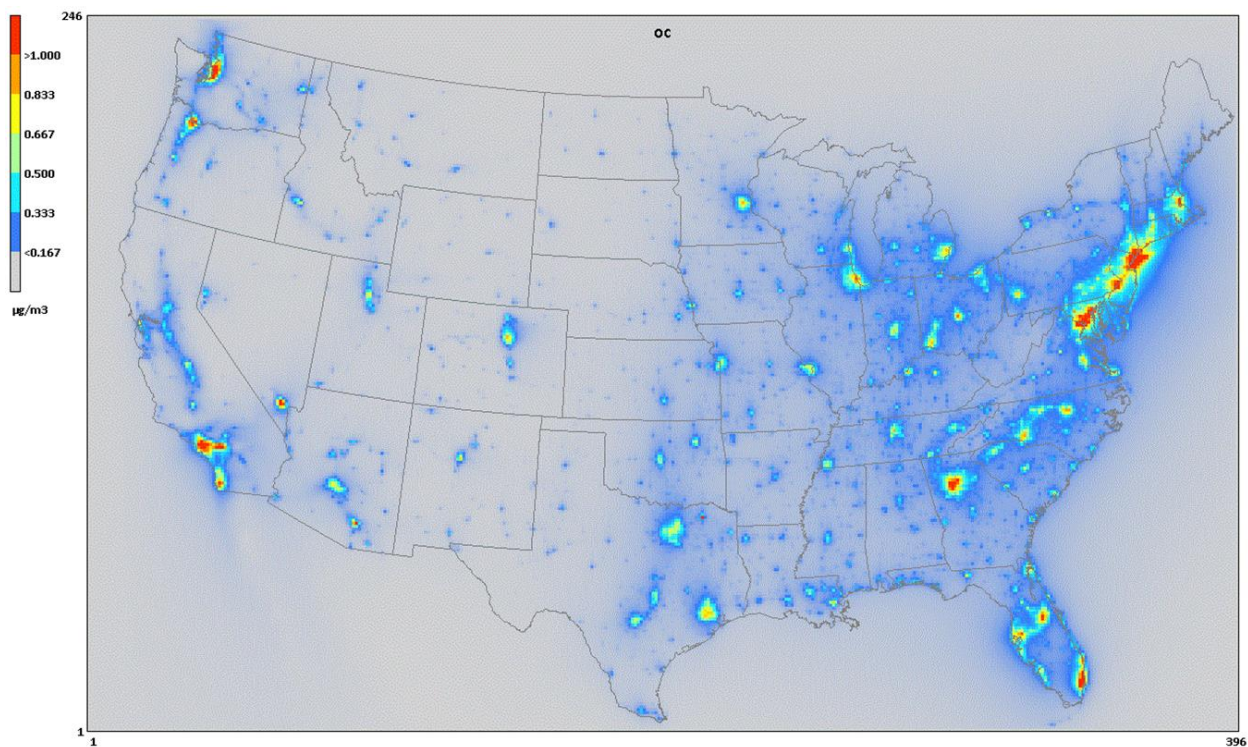
National Category-Based Spatial Distribution

Selected top ten maximum contributing categories by traced species concentrations for the Multnomah County monitor are represented in the following national figures below. To best demonstrate the spatial distribution of each tagged category, the following are represented by the tagged species of highest concentration as modeled within each individual category. Note that the scale remains the same for each figure. Additional category-specific graphics can be found in the Alpine report³.

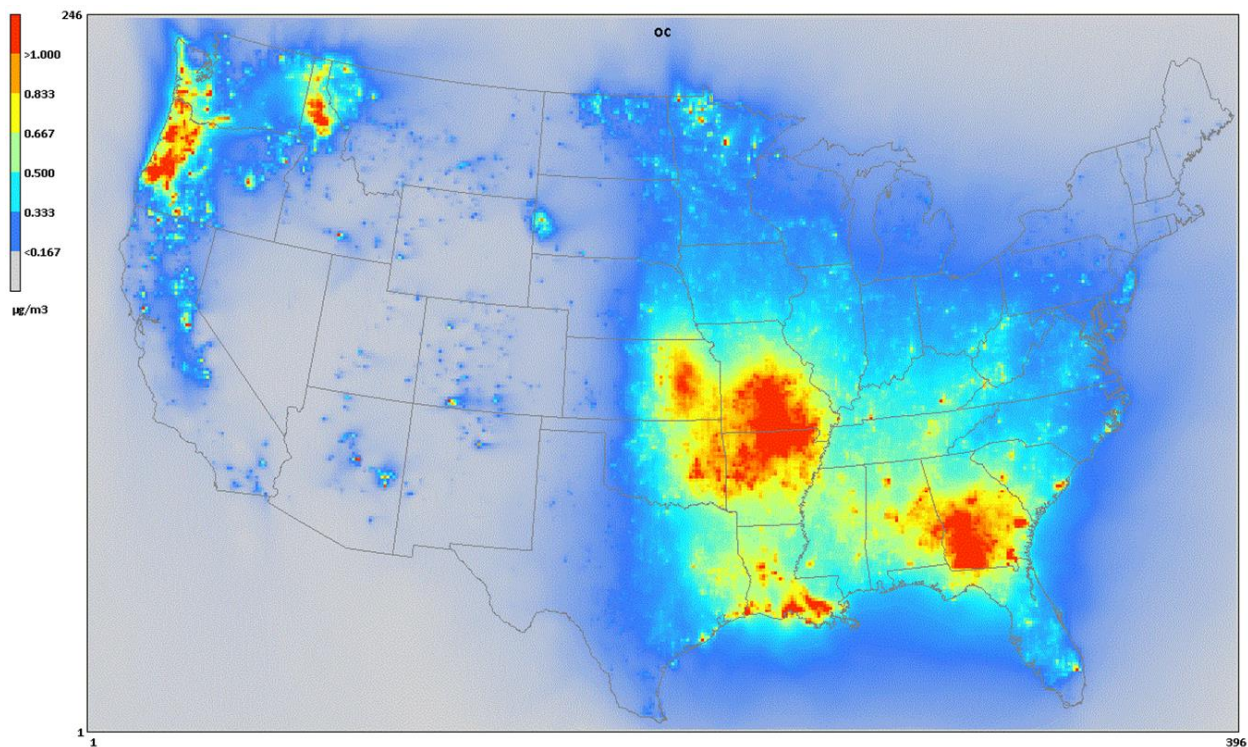


Modeled annual organic carbon concentrations ($\mu\text{g}/\text{m}^3$) from 2026 base case simulation for residential wood combustion category.

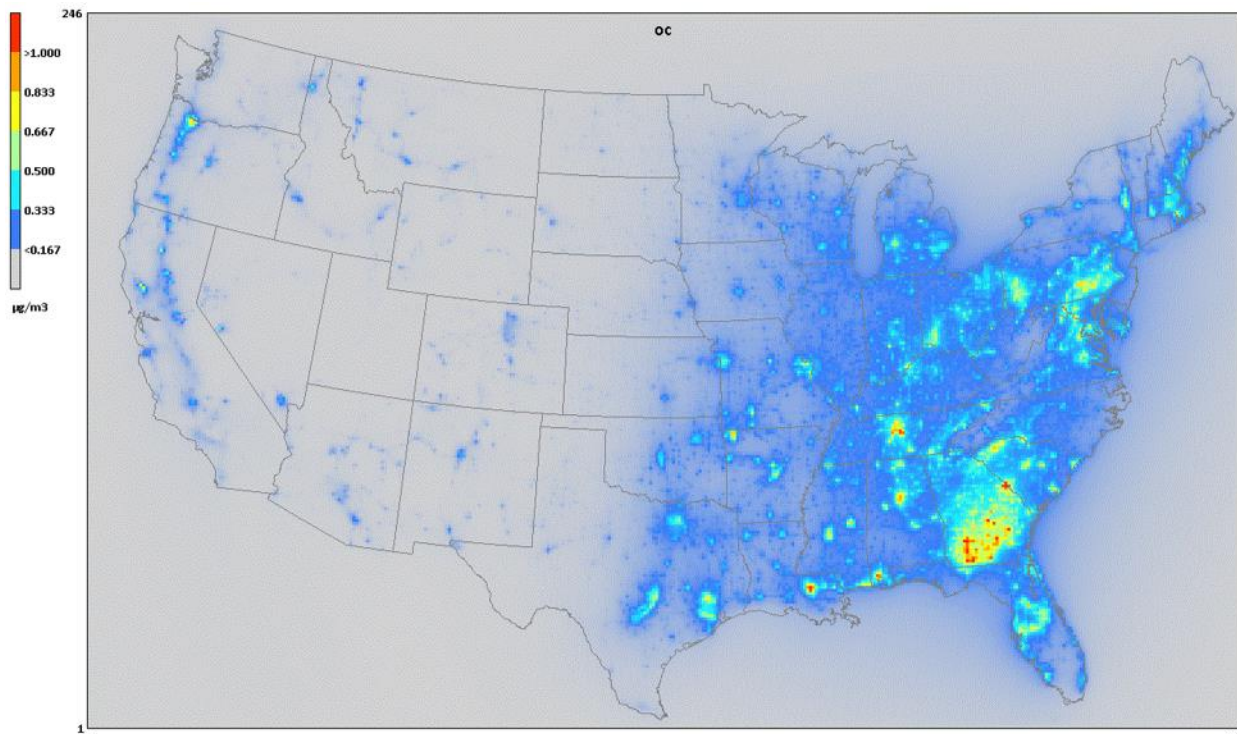
³ https://www.midwestozonegroup.com/_files/ugd/7ec07f_744eb1e14e444b2b93dff141fadee7b8.pdf



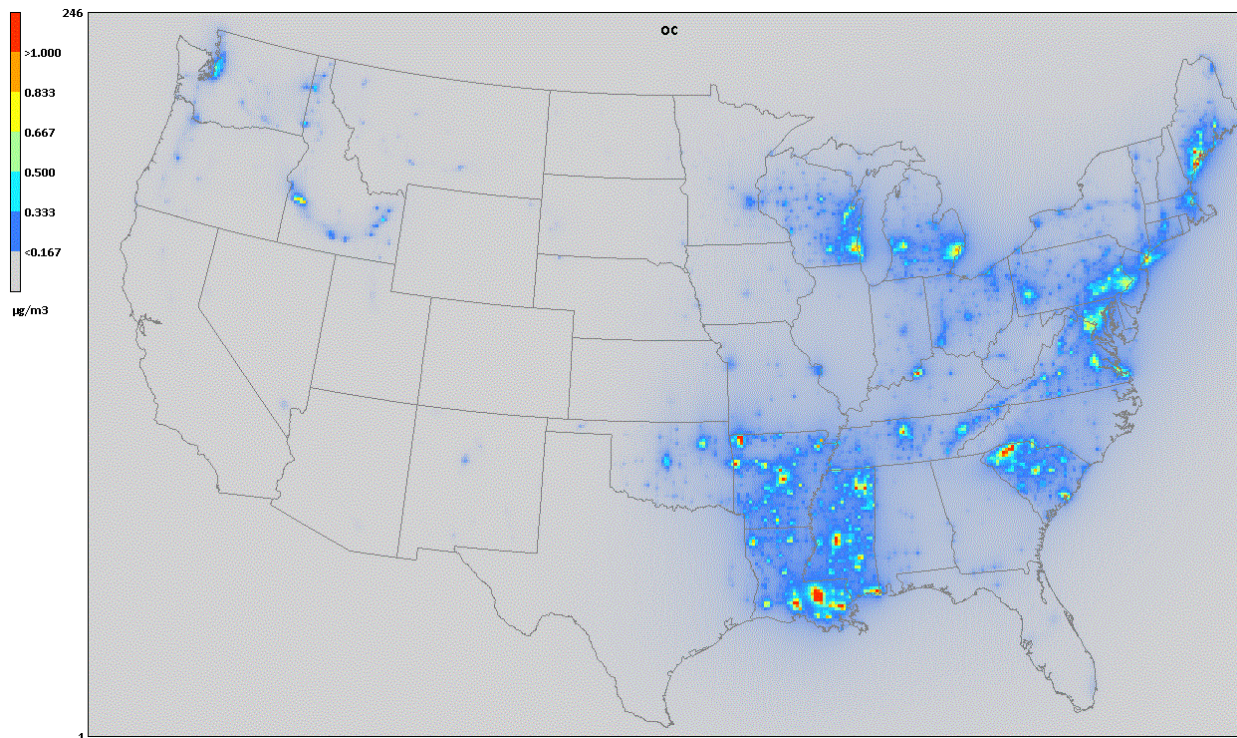
Modeled annual organic carbon concentrations ($\mu\text{g}/\text{m}^3$) from 2026 base case simulation for commercial cooking category.



Modeled annual organic carbon concentrations ($\mu\text{g}/\text{m}^3$) from 2026 base case simulation for prescribed fire category.



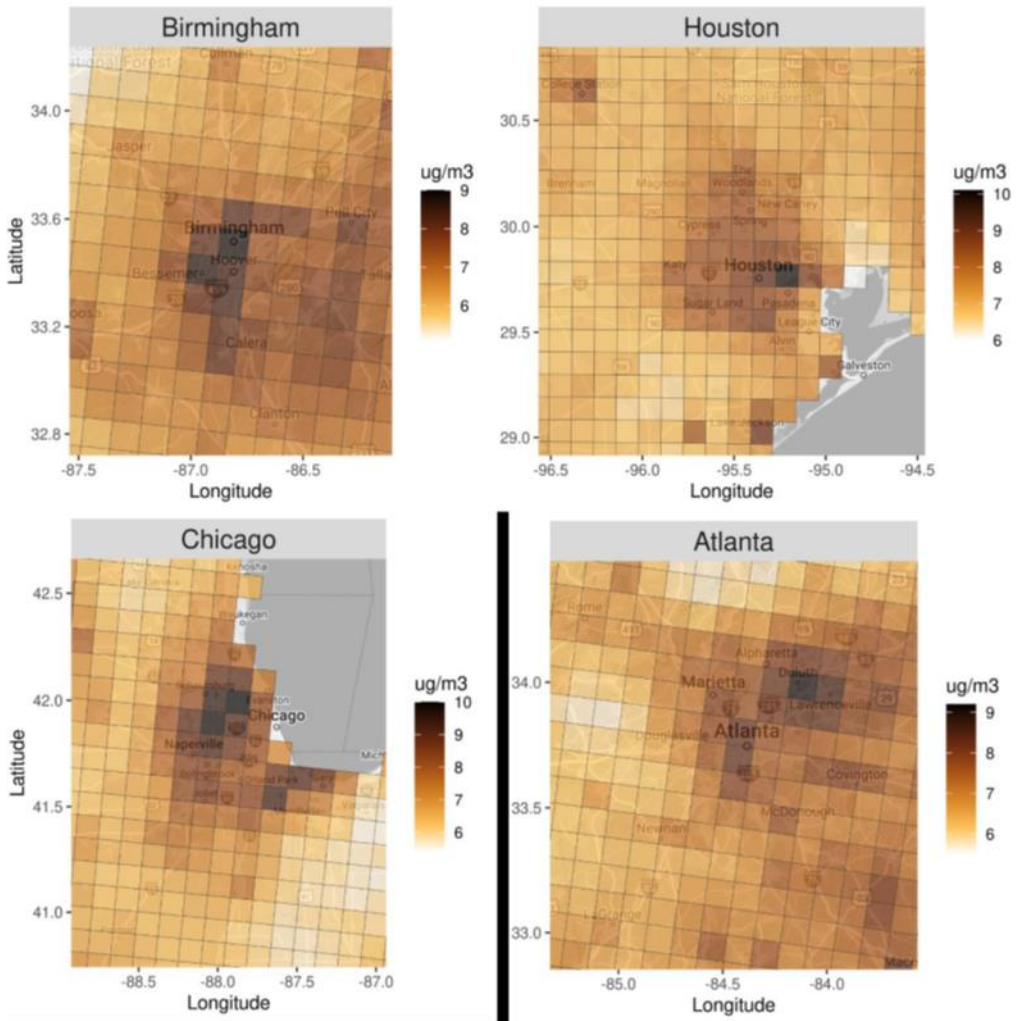
Modeled annual organic carbon concentrations ($\mu\text{g}/\text{m}^3$) from 2026 base case simulation for waste disposal category.



Modeled annual organic carbon concentrations ($\mu\text{g}/\text{m}^3$) from 2026 base case simulation for biomass fuel combustion category.

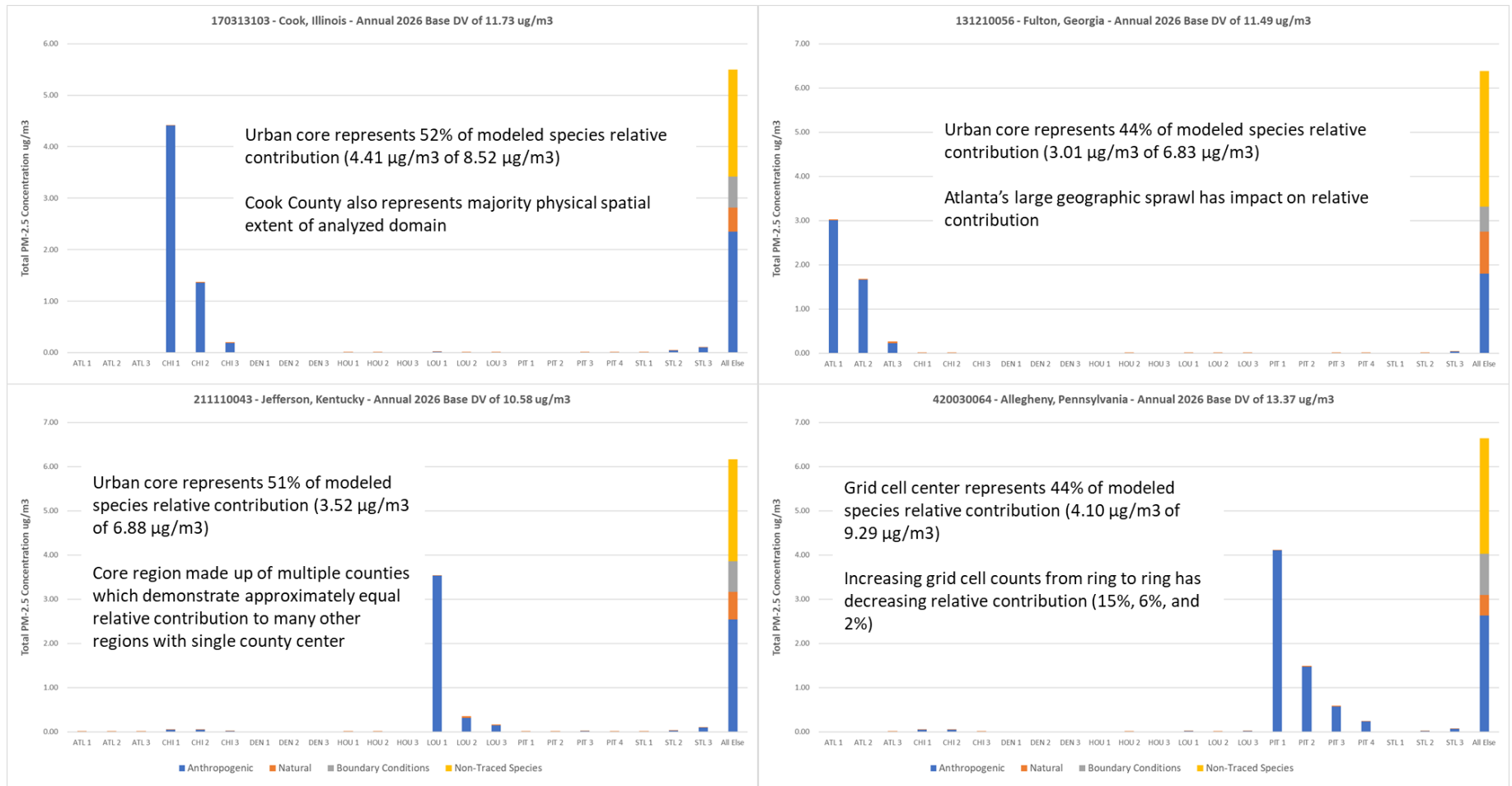
EPA and Alpine Findings on Spatial Extent of Contribution

In the RIA⁴ to the PM NAAQS reconsideration, EPA calculated gridded PM_{2.5} concentrations over selected urban areas based on the 2032 modeling case. A common feature of these diverse locations was the relatively high PM_{2.5} concentrations over the proximal urban area and lower concentrations just outside of the urban core. PM_{2.5} concentrations in the proximal core of these U.S. areas exceed revised and alternative standards levels considered in the RIA, whereas concentrations surrounding the urban core are below the revised and alternative standard levels. Additionally, when EPA applied the emissions reductions from adjacent counties to monitor locations in their attainment strategy, they used a $\mu\text{g}/\text{m}^3$ per ton PM_{2.5} air quality ratio that was four times less responsive than the ratio used when applying in-county emissions reductions (i.e., they applied four tons of PM_{2.5} emissions reductions from an adjacent county for one ton of emissions reduction needed in a given county). This analysis led to the finding that in most regions, NAAQS concentrations are being driven by the local PM_{2.5} increment and the relatively high responsiveness of PM_{2.5} concentrations to primary PM_{2.5} emission reductions comes from sources in proximity to those monitors.



⁴ https://www.epa.gov/system/files/documents/2024-02/naaqs_pm_reconsideration_ria_final.pdf

Alpine also conducted a source apportionment study⁵ which corroborated EPA's data to support regional PM_{2.5} relative contributions, and therefore also reduction potential, are significantly less effective as distance increases from monitors.



Both analyses support that reductions should focus on local areas around monitored exceedances as emission contribution to modeled concentrations and reduction effectiveness drops precipitously the farther from the monitor the reductions occur.

⁵ https://www.midwestozonegroup.com/_files/ugd/7ec07f_744eb1e14e444b2b93dff141fadee7b8.pdf



June 1, 2026

The Honorable Chair Jessica Vega Pederson
Multnomah County Commission
501 SE Hawthorne Blvd
Portland, OR 97214

Re: Multnomah County Draft 2026 Climate Justice Plan

Dear Chair Vega Pederson and Commissioners:

The Working Waterfront Coalition is a coalition of industrial businesses concerned about the economic vitality and the environmental health of the Portland Harbor. The WWC advocates for sound public policy that promotes environmental, social, and economic sustainability in supporting harbor and industrial businesses that are key to the economic vitality of Portland. Our members fabricate metal, build ships, move people and goods, and power our region. Our collective commitment to ensuring our community is healthy guides us, as does our support for family wage jobs that sustain Portland's economy.

We are writing regarding the recently announced revised draft Climate Justice Plan (the "draft Plan"), presented by the Multnomah County Office of Sustainability. We, as representatives of businesses in one of the most sustainable regions in the U.S., appreciate the intent behind the draft Plan and the focus on equity and frontline communities.

However, the latest draft plan did not address the concerns we raised a year ago. Following are serious concerns regarding the technical feasibility, narrow engagement process, and ultimately, the ability to implement this draft Plan in a way that not only achieves its goals, but ensures we continue to support the kinds of jobs and growth our region needs:

1. Limited Participation by Key Stakeholders

The current planning process has moved forward without adequately engaging or acknowledging the input from regulated entities or Portland's broader business sector. WWC has a history of willingness to work with the County on important issues affecting our members. But when a process is not open and transparent, or our input is ignored, the end product is lacking critical perspectives. Before finalizing the Climate Justice Plan, the County and the Committee should broaden their meaningful outreach to

include those most directly affected by these policies and seek a more balanced consensus.

2. Idealistic Goals are Unimplementable

The draft Plan outlines 12 goals: clean energy, air quality, transportation, housing, green infrastructure, and more. Unfortunately, the plan lacks rigorous technical pathways, baseline analysis, funding strategies, or performance metrics.

3. Alignment with other Climate Plans

This draft Plan is presented as a standalone product; there is lip service given to integration with the established regional climate and infrastructure plans — such as the City’s 2015 Climate Action Plan and the County’s Pathways to 100% Renewable by 2050. This disconnect creates the potential for duplicative regulations and inconsistent metrics, to name a few items. To ensure consistent timelines, performance measures, and jurisdictional roles, the draft Plan must align with city, regional and state climate frameworks — including the Portland Clean Energy Fund, Metro’s climate action planning, the Oregon Department of Energy’s Oregon Energy Strategy, the Climate Protection Program, and HB 2021 clean energy mandate.

4. Banning Future Fueling Sites is Not the Right Approach

It is understandable to want to address the environmental issues linked to old, abandoned gas stations. But newer stations are built to higher safety and environmental standards and typically serve communities where demand still exists. A ban could inadvertently limit access without achieving the intended environmental outcomes.

5. Seismic Retrofit Mandates Lack Focus and Feasibility

A one-size-fits-all requirement to retrofit every piece of equipment involved in the storage or distribution of liquid fuels — from large-scale tanks to individual home gas meters — is not realistic. Effective resiliency planning should prioritize risk-based assessments, not blanket mandates.

6. Full Fossil Fuel Elimination Goal is Out of Step with Broader Policy Landscape

The proposed 2050 fossil fuel phase-out raises serious implementation questions. Any plan with such far-reaching goals must account for how it will affect local employers, consumers, and energy systems — and consider whether it aligns with state and federal policy direction.

7. Ignores Economic Consequences

The draft continues to not evaluate the economic ramifications to all the proposed aspects Climate Justice Plan. The County is currently in a tough budget situation, and things don’t look promising in the future. So, the responsible evaluation of a proposed public policy would be to assess the economic and social costs of each of the

proposed initiatives. How and/or who will pay for them? How will those costs affect equity across all communities?

Thank you for your attention to these critical considerations. We appreciate the opportunity to comment and look forward to continued collaboration.

Sincerely,

A handwritten signature in black ink that reads "Tanya Hartnett". The signature is written in a cursive, flowing style.

Tanya Hartnett
Executive Director ***Working Waterfront Coalition***



June 1, 2026

Dear Multnomah County Office of Sustainability,

Re: Support for Multnomah County Climate Justice Plan Revised Strategies

Breach Collective is a 501(c)(3) organization based in Portland and Eugene, which builds power within the climate and labor movements through organizing, legal advocacy, education, and storytelling. We write in support of the Multnomah County Climate Justice Plan (CJP)'s revised strategies, released for community feedback in May.

At the outset, we acknowledge and commend the Office of Sustainability for its work last Fall and Winter in soliciting feedback on the draft Climate Justice Plan from a broad swathe of stakeholders, and in synthesizing and incorporating this feedback into the revised strategies. This is no small endeavor for a County office working under a reduced budget this past fiscal year.¹ It is clear on the face of the revised strategies that significant care was taken to incorporate stakeholder insights while staying true to the principles underpinning the development of the draft Climate Justice Plan.

Regarding the substance of the revised strategies, we wish to make a few brief thematic comments. First, we want to emphasize the threat that ongoing expansion of the gas system poses to multiple sections of the Climate Justice Plan (e.g. Air, Housing, Health, Fossil Fuels, Clean Energy, etc.), and the corresponding imperative of regulatory and incentives based strategies to transition off of fossil fuel use in buildings within the County. Particularly in light of recent indicators that gas utilities are scaling-up their political and legal attacks on Oregon's keystone greenhouse gas regulation for gas utilities - the Climate Protection Program - municipal-level initiatives will be essential

¹ Monica Samoya, *Multnomah County's Office of Sustainability avoids significant budget cuts after outcry* (Oregon Public Broadcasting, Jun. 13, 2025), [link](#) ("In total, the sustainability office will see about \$257,195 in funding reductions next fiscal year, which equates to losing 1.5 full-time employees.").

in ensuring we continue to make progress towards building decarbonization.² To that end, we commend the County for adding a strategy exploring regulatory pathways for integrated energy planning across electric and gas utilities – a strategy that is already implemented in many parts of Europe and which would help maximize the social benefits of building electrification for frontline communities.³ We also appreciate the additional focus on the health risks of hydrogen blending in the retail gas distribution system.⁴ However, while there is substantial community concern around accountability for hydrogen blending, we note that recent disinvestment in hydrogen and other fossil gas “alternatives” throws into question whether we will see further deployment of hydrogen blending in Oregon at any scale.⁵

Second, the section declaring that “Every Community Member is Safe From the Risks Posed by Fossil Fuels and Energy Infrastructure” remains strong across the board. Multnomah County has long been an important partner in mitigating the risks of fossil fuels and so-called “renewable fuels”. The targeted strategies in the plan, if implemented, will continue this legacy forward. Beyond the specific strategies referenced in this section, we recommend that Multnomah County Commissioners declare their support for the many community, labor, and environmental groups currently advocating for a strong Critical Energy Infrastructure Hub Policy expected to be considered by Portland City Council in the Fall.⁶

Third, one of the greatest emerging threats and challenges to a just energy future is the rapid expansion of data centers in our region. This development threatens frontline communities with pollution, has contributed to the increase in utility rates, and has made our statewide renewable energy goals much more difficult to meet. Both electric and gas investor-owned utilities see opportunities with data centers that are incongruous with broader climate justice goals in Multnomah County and the State of Oregon.⁷ Either under or in addition to the strategy of “Work[ing] to limit rate increases and support[ing] rate setting processes that better consider affordability and other

² See, e.g., Monica Samoya, *Oregon’s ambitious greenhouse gas reduction program faces a fresh legal challenge* (Oregon Public Broadcasting, Apr. 16, 2026), [link](#). See also Nigel Jaquiss, *Oregon’s Climate Protection Program Costs Far More Than Other States’ – and Is Far Less Accountable* (Willamette Week, Apr. 3, 2026), [link](#). We note that this latter article primarily cited perspectives from opponents of the Climate Protection Program, presented those opinions as fact, and mischaracterized the policy in several places.

³ Multnomah County Office of Sustainability, *Fossil Fuels*, p. 7, [link](#).

⁴ *Id.*, p.5.

⁵ Alex Baumhardt, *NW Natural alternative fuel projects face uncertain future as partners falter* (Oregon Capital Chronicle, Dec. 11, 2025), [link](#).

⁶ See City of Portland, “Critical Energy Infrastructure (CEI) Hub Policy Project”, [link](#).

⁷ See Julia Stone et al., *Dirty Secrets: Data Centers Drive Demand for Gas in Oregon, Washington* (June 2026), [link](#).

residential customers' interests," we recommend and request that staff at the Office of Sustainability be given leave to involve themselves in future state and regional policy and regulatory processes related to the future of data centers, so staff can utilize their considerable expertise to protect Multnomah County's residents and frontline communities throughout Oregon.

We appreciate the opportunity to provide further written feedback on the Climate Justice Plan, and look forward to working with the Office of Sustainability and County Commissioners to ensure its adoption this summer.

Sincerely,

Danny Noonan
Climate, Energy & Labor Strategist
Breach Collective

Nick Caleb
Climate and Energy Attorney
Breach Collective



350PDX
3625 N. Mississippi Avenue
Portland, OR 97227
350pdx.org

June 1, 2026

Re: Multnomah County Climate Justice Plan

Dear Multnomah County Office of Sustainability,

Thank you for the excellent work you have done on the Multnomah County Climate Justice Plan, and for the opportunity to provide comments. 350PDX supports the draft plan that has been circulated for final review. We are a nonprofit with thousands of members around the Portland area, and we focus on advocating for better climate policies and activating people to live out climate justice more fully.

We appreciate the way Multnomah County's Office of Sustainability has gone about the process of developing this plan, centering communities on the front lines of climate impacts, and really listening to community input as you brought different iterations of this plan. The different sections of the plan are actionable, with clear indications of what is currently possible for the county to pursue, and what needs to happen in coalition or with stronger community pressure. With the development of a few opening pages to describe the Climate Justice Plan and some definitions of the strategy categories and levels of control, this plan will be easy to navigate and understand.

There are some aspects of the "Fossil Fuels" Goals & Strategies section that we would like to see strengthened and that we would like to have the county's direct support for, rather than just relying on "community leadership." For example, the section on the use of "green hydrogen" to replace "natural gas" (methane): this is listed as an area that would require community leadership and is stated as an area of research, and is listed as an area with low county control and priority. It would be very helpful for the county to conduct research on the feasibility and health impacts of converting methane pipes and processing facilities to hydrogen, and the real greenhouse gas emissions that are generated from producing so-called "green hydrogen." It seems like this would be in the county's purview as a public health question. The use of "green hydrogen" (or other "colors" of hydrogen that are produced using varying levels of fossil fuels) is being used as a delay tactic by methane companies, who act as if they are just using methane as a "bridge," until they can switch to hydrogen. But hydrogen does not seem particularly feasible, and the pipes would have to be replaced with ones that could withstand more than an 80/20% blend of methane/hydrogen.

Similarly, the strategy: "Identify and pursue regulatory pathways to limit the growth of the natural gas system and support pathways for integrated energy planning across electric and gas utilities," is listed as one that will rely on community leadership, though it is listed as a

Building the climate justice movement.



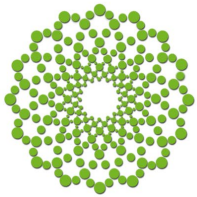
350PDX
3625 N. Mississippi Avenue
Portland, OR 97227
350pdx.org

high county priority. The community needs the county and other levels of government to help create regulatory pathways that will make it easy to switch away from methane “natural” gas and that will allow the electrical grid to affordably handle the increased load. The greenwashing and misinformation about hydrogen (or other reasons to keep methane) will continue unless there is firm regulatory guidance to shift the region away from this public health, climate, and environmental harming fossil fuel. That said, we understand the county can only focus on its specific scope of control. We would encourage you to at least change this to an “investment opportunity,” where the county can take leadership in coordinating efforts with with the city, state, the PUC, and other necessary entities to make sure Oregon can transition away from methane (natural) gas, particularly on a timeline that fits with Oregon’s 100% clean energy goals.

Other than that, our main concerns have to do with implementation. It would be helpful to have a timeline for when portions of this plan can be expected to be completed. It would also be important to discuss how these projects will be funded. Clear directives will likely be necessary from the County Commission regarding the authority of the Office of Sustainability to work with various county offices and departments to implement these strategies, with funding and staff time from those offices being able to be used for this purpose. Many strategies in this plan require the county’s “influence” in areas it does not have direct control over, so processes and permissions for exerting this influence will need to be initiated. In essence, we would like to see it clearly defined that the Office of Sustainability has the authority to carry out these strategies within and outside the county, and to work with community partners who will need to provide leadership in order to achieve the goals under “community leadership.”

Thank you again for all the hard work that has gone into this Climate Justice Plan! We are in support and look forward to seeing it voted in and implemented.

Dr. Cherice Bock
Climate Policy Director
350PDX



**GREEN ENERGY
INSTITUTE**
Lewis & Clark Law School

Carra Sahler
10101 S. Terwilliger Boulevard
Portland, Oregon 97219
Phone: (503)768-6634 Fax: (503)768-6671
E-Mail: sahler@lclark.edu

June 1, 2026

Multnomah County
Office of Sustainability
501 SE Hawthorne Blvd.
Portland, OR 97214

Via email sustainability@multco.us

RE: Support for Multnomah County's Draft Revised Climate Justice Plan

The Green Energy Institute at Lewis & Clark Law School is a nonprofit energy and climate law and policy organization within Lewis & Clark's top-ranked environmental, natural resources, and energy law program. We appreciate the opportunity to comment on this important, strategic approach to tackling the climate crisis in Multnomah County.

The revised draft Climate Justice Plan (CJP) thoughtfully reflects feedback from stakeholders while continuing to recognize the unprecedented challenges of the climate crisis and the limitations within which the County is operating. We appreciate the specific goals and strategies aimed at each of these issues, and we support the recommendations outlined in the revised draft CJP. The Green Energy Institute at Lewis & Clark Law School looks forward to assisting the County in implementing its recommendations.

We continue to urge the County Commissioners to ensure that implementation of the recommendations in any final adopted CJP is resourced. The overlapping nature of the climate crisis with other facets of the County's responsibilities, such as housing and health, underscore the importance of a continued, strong Office of Sustainability. If the County's budget constraints continue, success will mean (1) identifying strategies that can be self-funded, (2) prioritizing certain higher-impact strategies, and (3) leveraging independent funding streams.

We offer specific support for the following elements of the CJP.

1. Equitable building electrification advances climate justice

We appreciate that the CJP is explicit about the need to "advocate for changes to federal and state programs, as well as Energy Trust of Oregon offerings, to explicitly support the electrification of end uses, including fuel switching from methane (natural gas) to electric sources of heating and

cooking.”¹ Working with federal and state programs to encourage and offset the costs of fuel switching will help to support an equitable transition to high-efficiency electric systems.

Additionally, the revised draft CJP is honest about the value of renewable natural gas (RNG) and hydrogen for a gas-system decarbonization strategy, describing these alternative fuels as “uncertain and a topic of some debate.”² The updated CJP appropriately underscores the importance of limiting the growth of the gas system to ensure adequate gas supplies for current needs while preventing investments in new assets that may not be needed before the end of their useful lives or their full financial depreciation.

2. The County’s recognition of its role in taking action on locally significant strategies.

We appreciate that the CJP recognizes County action is necessary to reduce local emissions and pollution, without relying on the legislature or DEQ to step in. While we are always supportive of state-wide action, it is not always feasible or efficient to wait.

We are excited about the prospect of increased county-level involvement in supporting community-led air quality monitoring, outreach, and education.³ Initiatives, led by the County’s Health Department, Environmental Health Division, and Office of Sustainability, to invest in air quality sensors, and investigate community impacts and solutions, offers an especially important opportunity to solve a challenging problem in the County.⁴

As the County is likely aware, the rapid growth of e-commerce is driving larger concentrations of warehouses and freight hubs, increasing cumulative air pollution and health risks in nearby neighborhoods.⁵ Over 66 million people — nearly one in five in the United States — live near freight facilities and corridors.⁶ These sites expose people to significant and disproportionate levels of air pollution, with areas near more than 10 freight facilities experiencing average concentrations of diesel particulate matter 85% higher than the national average, more than twice as many high ozone days, nearly 60% more elevated PM2.5 days, and a 32% higher risk of developing cancer from exposure to air toxics.⁷ Communities of color make up nearly 80% of people living near the highest concentrations of freight facilities.⁸

As the County’s draft revised CJP recognizes, indirect source rules offer meaningful reductions in air pollution and have successfully encouraged wider electrification in jurisdictions such as

¹ CJP at 77.

² CJP at 92.

³ CJP at 3, 5.

⁴ CJP at 5.

⁵ See Sam Wilson, *Addressing Freight Pollution at the Source: Air Pollution, Freight Facility Clusters, and the Role of Indirect Source Rules* (Union of Concerned Scientists, May 27, 2026), <https://www.ucs.org/resources/addressing-freight-pollution-source>.

⁶ Id.

⁷ Id.

⁸ Id.

California’s South Coast Air Quality Management District, which adopted the Warehouse Actions and Investments to Reductions Emissions (WAIRE) Program.⁹ As federal leadership on freight pollution stalls, the implementation of indirect source rules on both state and local levels is critical to reduce emissions and protect public health. For that reason, we appreciate that the CJP considers the implementation of indirect source rules on high emitting sites such as freight hubs as an effective strategy for protecting communities from new and existing pollution sources in their neighborhoods. We understand the administrative barriers involved in adopting new strategies and hope for continued engagement between Multnomah County and Oregon DEQ. We recognize a need for rules that accurately reflect the extent of the county’s jurisdiction in this area.

Similarly, we appreciate the County’s identification of NO_x emission standards for gas appliances as a possible policy solution to air pollution caused by gas combustion. The updated CJP Goals and Strategies lists the Office of Sustainability as a supporting department in investigating the feasibility of such rules in the County, which we fully support. We look forward to investigating opportunities to address pollution from natural gas combustion in the coming years.

Finally, we commend the County’s leadership in recognizing that local government voices are “key” in the clean energy transition, “given their close interaction with constituencies, and their roles as large utility customers and entities with a perspective that is often highly valued in utility and regulatory spaces.”¹⁰ We especially appreciate that the CJP states a plan for the Office of Sustainability to advocate for “the full implementation of climate policies in Oregon, including HB 2021 (2021), the Climate Protection Program, and others at the Oregon Legislature, the Oregon Public Utility Commission, the Oregon Department of Environmental Quality, and other relevant regulatory and decisionmaking bodies.”¹¹ Again, we look forward to supporting the County in taking its leadership role seriously.

Conclusion

We thank the Office of Sustainability and the many community partners for developing such a robust and comprehensive plan. We look forward to implementing the measures and recommendations the CJP calls for.

Sincerely:

Carra Sahler
Director and Staff Attorney
Green Energy Institute at Lewis & Clark Law School

⁹ Id.

¹⁰ CJP at 78.

¹¹ Id.



June 1, 2026
Multnomah County Board of Commissioners
501 SE Hawthorne Blvd.
Portland, OR 97214

RE: NW Natural's Comments on the Updated Climate Justice Plan

Chair Vega Pederson and Commissioners,

Thank you for the opportunity to provide comments on the updated draft Multnomah County Climate Justice Plan (the "Plan"). NW Natural appreciates the County's continued focus on climate resilience, environmental stewardship, and protecting vulnerable and frontline communities from the impacts of extreme weather and climate-related disruption.

As a utility provider serving hundreds of thousands of homes and businesses across the region, NW Natural recognizes that achieving Oregon's long-term emissions reduction goals requires thoughtful planning, strong partnerships, and durable investments across multiple sectors. We also recognize that energy systems, housing systems, transportation systems, and public health outcomes are increasingly interconnected. We support continued collaboration toward practical, equitable, and effective climate solutions.

At the same time, we remain concerned about many aspects of the County's draft Plan and do not believe it is ready for adoption. We have seen no evidence that the County has undertaken the level of broad technical stakeholder engagement, systems modeling, or economic impact analysis necessary to support adoption of a framework of this complexity and scale. Instead, the Plan reads as a loose, arbitrary, and ultimately unfunded compilation of advocacy positions, not a governance document. Specifically, we believe additional work is necessary in the following areas:

1. Deeper Engagement of Technical Stakeholders and Subject Matter Experts ("SMEs")

The County's emphasis on incorporating historically underrepresented voices into climate planning is important and appropriate. Also, a viable climate framework must also include a foundational collaboration with operational stakeholders responsible for maintaining and implementing the systems directly affected by the Plan and directly supporting the community's needs.

Utilities, infrastructure providers, manufacturers, labor and workforce organizations, freight operators, housing providers, engineers, and technical experts were not meaningfully engaged during the development of the Plan’s energy and infrastructure-related strategies. These strategies have largely not changed over the last year. Several proposed strategies are not connected to operational realities, implementation timelines, permitting constraints, workforce availability, infrastructure limitations, and existing regulatory structures¹. Additionally, some strategies just have incomplete information. Climate planning cannot succeed through advocacy perspectives alone. Effective policy decisions and implementation require collaboration with the entities responsible for delivering reliable and affordable energy, maintaining critical infrastructure, and ensuring public safety during extreme weather events and emergencies. We encourage the County to convene a formal technical and operational stakeholder table prior to adoption of the Plan.

Additionally, we are concerned by the lack of transparency surrounding the development of the draft Plan in both its first iteration and this new draft. **NW Natural submitted public records requests seeking additional information regarding stakeholder engagement and the development of the Plan’s recommendations and strategies; the fulfillment of these requests remains incomplete. On June 19, 2025, we submitted an initial request and were told it would cost \$17,500 for access to the requested public documents. We then sent clarifying requests on October 6, 2025 and November 19, 2025, and still have not received a full response to a request for what we believe represents general public documentation that is regularly made available in a municipality’s undertaking of this kind (see Exhibit A). No date has been provided for the County’s anticipated fulfillment of the request.** Without the County’s response to the records request, we lack sufficient clarity on how major policy recommendations were developed, what technical analysis informed them, or how differing stakeholder perspectives were evaluated. This is a surprising lack of transparency from a government agency charged with being a convener. The lack of fulfillment of the records request further reinforces the need for appropriate technical work on the Plan prior to adoption.

2. Lack of Technical, Feasibility, or Economic Impact Analysis and Implementation Planning

The draft Plan includes numerous, ambitious strategies related to forced electrification, energy affordability, infrastructure transformation, and resilience. However, to our

¹ Examples are included but not limited to the following pages in the PDF Plan: 3, 4, 7, 22, 87, 88, 90, 100. We can provide more details of specific examples once we have access to public records that can help us understand the derivation of the Steering Committee’s advocacy around the development of the Plan.

knowledge, the process has not included technical feasibility analysis, cost estimates, economic impact analysis, or systems modeling. In a time when the County is already struggling to close a significant budget deficit, we continue to be concerned that many of the Plan’s proposed strategies remain aspirational rather than actionable, leveraged, and with the kind of return on investment our community expects. We remain unsure of how public staff intend to address particularly cost-heavy action items and initiatives.

3. Jurisdictional Coordination and Governance Clarity

Several proposed strategies fall outside of the County’s authority and instead implicate state regulatory structures, utility ratemaking, regional energy planning, and statewide infrastructure policy. To our knowledge, there has been minimal coordination between the County and exterior agency and government partners, and in certain cases the language is inaccurate and lacks appropriate context for leaders to make informed decisions about the use of limited financial resources—both the County’s funds and customer’s finances. Clear delineation between County authority, advocacy priorities, and external regulatory processes is necessary to avoid confusion, duplication, and conflicting policy direction.

- An example is found in the “Support Policies to Ensure Utilities Use Ratepayer Funds in the Public Interest,” strategy of the Plan, which inaccurately implies that NW Natural is using ratepayer funds for lobbying. This is untrue. NW Natural does not seek recovery on its lobbying hours, which are submitted to the Public Utility Commission (our regulator) at their request during rate cases. We are unclear what this section is trying to accomplish with its continued disconnection from the PUC standards for the utilities they regulate. Additionally, and conversely, we are unaware of the amount of time spent by Office of Sustainability staff on advocacy versus governance and would like to see a scoped percentage and a financial breakdown in accordance with this Plan.

4. Additional Information on Resource Adequacy and Energy Efficiency

The Plan ignores well-documented regional energy providers’ concerns about the electric grid’s ability to handle an increase in demand. Resource constrained systems are vulnerable to blackouts, leaving residents without power until the system can be restored. With projected energy need growth in the Pacific Northwest, the Western Interconnection will need to add dispatchable resources to help the electricity supply match pace with demand. Electrification exacerbates the demand on the electricity grid, increasing the risk of power outages. Direct-use of natural gas in communities helps lessen the demand on the electricity grid and provides resiliency features during blackouts and extreme winter weather—like allowing families to shelter-in-place and still have warmth from natural gas fireplaces, continuing to be able to cook on natural gas cooktops, and many natural gas

water heaters can continue to provide hot water.² To help create a more resilient and sustainable energy future, utilities should be involved in Climate Action Planning/Climate Justice Planning, allowing for different perspectives and knowledge to be shared between groups and a pathway to the future to form. To help further the understanding of the energy future of the Pacific Northwest, NW Natural recommends reading the Pacific Northwest Utilities Conference Committee (PNUCC) and the Northwest Gas Association (NWGA) report³, as well as the Energy & Environmental Economics' Report⁴. Both reports come to similar conclusions, our electricity grid is constrained and increasing demand will lead to a gap between the supply of electricity and the demand. NW Natural recommends adding the two reports to the Climate Justice Plan, so readers can understand the constraints and opportunities of both energy systems.

In addition to the constraint forced electrification would put on the electricity grid, NW Natural has concerns regarding the recommendation for fuel switching. There seems to be confusion that fuel switching is equivalent to energy efficiency, which is incorrect. Energy efficiency is the act of making equipment and buildings operate as efficiently as possible, whereas electrification and fuel switching is merely switching the energy burden and emissions to another fuel source. Electrification is not the same as decarbonization.

NW Natural is proud to support energy efficiency in both households and businesses. Our customer dollars help fund our Oregon Low Income Energy Efficiency (OLIEE) program and Energy Trust of Oregon's energy efficiency programs for gas equipment. OLIEE has a proven track record of helping our most vulnerable customers receive valuable energy efficiency and health and safety⁵. Energy Trust of Oregon's energy efficiency programs fund upgrades to equipment and structures to aid in lowering energy use and costs for customers. Energy Trust of Oregon's multi-year plan as approved by the Public Utility Commission means our customers are paying more than they ever have for energy efficiency as a portion of their bills. In contrast, fuel switching could lead to unintended consequences for Multnomah County residents. Compared to the cost⁶ those of natural gas. Between the cost of new equipment and the increased monthly energy bill, fuel

² [Natural gas in a power outage - NW Natural](#)

³ [Guidehouse analysis of regional energy reports 2025](#)

⁴ [E3-NW-RA-Final-Report_040826.pdf](#)

⁵ Over the last four years, the Oregon Low Income Energy Efficiency (OLIEE) program funding has served 507 income-qualified households in Multnomah County alone through energy efficiency upgrades and health and safety measures. More than \$8 million has been invested directly into these homes. Based on a recent impact evaluation, participating households are achieving average energy bill savings of 16-19%.

⁶ <https://www.aga.org/news/news-releases/doe-announces-natural-gas-affordability-jumps-to-3-5-times-more-affordable-than-electricity/>

switching becomes financially burdensome and does not always lead to emission reductions.

A critical approach to decarbonization starts with understanding the interdependencies between the electric and gas systems. The draft Plan does not reflect any understanding of these interdependencies, nor have we received any outreach from Staff that indicates there is interest in engaging in this level of technical analysis or discussion. NW Natural is committed to decarbonizing our system while keeping affordability, reliability, and resiliency in mind.

NW Natural remains committed to providing County residents with an affordable and reliable energy service as we have done for over 165 years. The scope and the significance of the proposed strategies in the Plan should be considered by a more comprehensive stakeholder and technical review process, as well as an independent economic impact analysis prior to final consideration. Such a process will allow the County to be a leader and a convener in building a stronger framework through deeper collaboration, applied and credible technical analysis, and more thorough long-term planning. We appreciate the opportunity to provide comments and look forward to engaging in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Rathfelder". The signature is fluid and cursive, with the first name "Amy" being more prominent than the last name "Rathfelder".

Amy Rathfelder

Community and Government Affairs, Multnomah County

NW Natural

EXHIBIT A: PUBLIC RECORDS REQUEST DOCUMENTATION AROUND CLIMATE JUSTICE PLAN DEVELOPMENT

June 2025: Initial submission of public records request

Dear Amy Rathfelder:

Multnomah County acknowledges receipt of your Public Records Request. For requests received outside of normal business hours -- 8:00 am to 5:00 pm PST, Monday through Friday, excluding public holidays -- this request is considered received on the first business day following the County's receipt of your request. Your request was submitted to this office on 6/19/2025 and given the reference number M000072-061925 for tracking purposes.

Records Requested: I respectfully request copies of all public records in the County's possession related to the development of the 2025 Draft Climate Justice Plan. This request is intended to be comprehensive and includes, but is not limited to, the following categories of documents: 1. Steering Committee Materials - All meeting agendas, minutes, notes, and materials presented or discussed by the steering committee. - Any documentation of promotion, outreach, or facilitation for public workshops related to the Plan. - Any copies of a public engagement strategy or plan used to guide the community engagement process. 2. Technical and Informational Materials - Any information (including technical documents, data, memos, or summaries) shared with the steering committee by Multnomah County staff or consultants. 3. Government Stakeholder Engagement - Documentation identifying which individuals or departments from each "Government Organization" listed in the Targeted Strategies section (pages 33-87) were consulted. - All feedback or input provided by these organizations, including dates and formats of feedback (written, verbal, and/or meeting-based). 4. Review and Analysis Methodology - Records describing the County's process for evaluating proposals including in the Targeted Strategies, such as: Economic feasibility analysis, cost-benefit or trade-offs analysis, equity assessments and/or reliability considerations. Thank you in advance for your attention and consideration in delivering these records. If possible, the records should be delivered in digital format. Please reach out to me if any part of this request is unclear, or would benefit from clarification to expedite your response. I am happy to discuss it further.

At this time, the County is uncertain whether it is the custodian of the requested record. The County will review your request to determine if it has responsive records. The County will then gather an estimate of the costs to provide copies of requested public records for which the County does not claim an exemption from disclosure. The County is permitted to charge its reasonably calculated actual costs to provide records. Fees include research time to locate and analyze the requested records, even if no records are located or if the requested records are determined to be exempt from disclosure.

You can monitor the progress of your request at the link below. Thank you for using the Multnomah County Public Records Center.

Sincerely,
Multnomah County
Communications

Log into the [Public Records Center](#) to review or update this request.

August 2025: County orders payment of \$17,500 to fulfill request:

RE: Public Records Request of June 19, 2025, Reference # M000072-061925

Dear Amy Rathfelder,

Multnomah County received a public records request from you on June 19, 2025. You requested the following: I respectfully request copies of all public records in the County's possession related to the development of the 2025 Draft Climate Justice Plan. This request is intended to be comprehensive and includes, but is not limited to, the following categories of documents: 1. Steering Committee Materials- All meeting agendas, minutes, notes, and materials presented or discussed by the steering committee. - Any documentation of promotion, outreach, or facilitation for public workshops related to the Plan. - Any copies of a public engagement strategy or plan used to guide the community engagement process. 2. Technical and Informational Materials- Any information (including technical documents, data, memos, or summaries) shared with the steering committee by Multnomah County staff or consultants. 3. Government Stakeholder Engagement- Documentation identifying which individuals or departments from each "Government Organization" listed in the Targeted Strategies section (pages 33-87) were consulted. - All feedback or input provided by these organizations, including dates and formats of feedback (written, verbal, and/or meeting-based). 4. Review and Analysis Methodology- Records describing the County's process for evaluating proposals including in the Targeted Strategies, such as: Economic feasibility analysis, cost-benefit or trade-offs analysis, equity assessments and/or reliability considerations. Thank you in advance for your attention and consideration in delivering these records. If possible, the records should be delivered in digital format. Please reach out to me if any part of this request is unclear, or would benefit from clarification to expedite your response. I am happy to discuss it further.

After reviewing your request you are required to pay a \$17,500 fee before the County will begin processing this request. If the actual cost is less, you will receive a refund. If the cost is more, you must pay the full amount due prior to accessing the documents.

If you would like to narrow the request you submitted that could reduce the estimated cost.

Please send payment to:

Multnomah County
Attn: Record Custodian
501 SE Hawthorne Blvd., #600
Portland, OR 97214

Sincerely,
Multnomah County

October 2025: NW Natural submits an updated records request:

Dear Amy Rathfelder:

Multnomah County acknowledges receipt of your Public Records Request. For requests received outside of normal business hours -- 8:00 am to 5:00 pm PST, Monday through Friday, excluding public holidays -- this request is considered received on the first business day following the County's receipt of your request. Your request was submitted to this office on 10/9/2025 and given the reference number G000039-100925 for tracking purposes.

Records Requested: I respectfully request copies of all public records in the County's possession related to the engagement process with external stakeholders in the development of the 2025 Draft Climate Justice Plan. After several conversations with County staff and confirmation from the Board of Commissioners, it is clear there was an extensive engagement process between Multnomah County and members of the Steering Committee as well as specific members of the public invited to the engagement processes' public meetings. This engagement process (as outlined from pages 21-25 of the draft Climate Justice report and as specifically highlighted on page 13 of the Sept 18, 2025 Commission presentation) was not shared transparently with the broader public at the time it was happening, and newly engaged stakeholders need to have the same information that was shared previously in order to appropriately engage the next part of the process now. Therefore, we would expect that documentation from a public engagement process will now be made available to stakeholders and interested members of the public alike at no cost. Again, we are specifically requesting those items employed in the engagement process, including but are not limited to: all information provided by the County and resulting from "workshops, webinars, open houses, informational meetings" like meeting agendas, meeting notes, public surveys/survey results, visuals and technical information provided during past public meetings/open houses, documentation of the promotion of the public meetings). We ask for the documentation as soon as possible as the County has scheduled a new set of public forum based on the past engagement process but newly engaged stakeholders have not yet been allowed to review past engagement process materials.

At this time, the County is uncertain whether it is the custodian of the requested record. The County will review your request to determine if it has responsive records. The County will then gather an estimate of the costs to provide copies of requested public records for which the County does not claim an exemption from disclosure. The County is permitted to charge its reasonably calculated actual costs to provide records. Fees include research time to locate and analyze the requested records, even if no records are located or if the requested records are determined to be exempt from disclosure.

You can monitor the progress of your request at the link below. Thank you for using the Multnomah County Public Records Center.

Sincerely,
Multnomah County

October 21, 2025: County directs NW Natural to general Climate Justice Plan website; NW Natural acknowledges receipt but notes that this is not sufficient fulfillment of original request, as the website does not include developmental and public meeting materials:

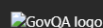
Hi, Amy.

Denis Theriault here, from Communications. The Office of Sustainability has created a public website on their engagement work, with links to materials that fit within the list of specific types of records your request describes. It's at <https://multco.us/info/developing-climate-justice-plan>.

Do the materials included within satisfy your request? I'm asking because the latter part of the request is specific, whereas the initial language mentions "all records," which would be seeking records not described in the list in the last paragraph.

Thanks!
DT

Log into the [Public Records Center](#) to review or update this request.



November 2025: Request is held while the Communications Office coordinates with the Sustainability Office

RE: Public Records Request of October 09, 2025, Reference # G000039-100925

Dear Amy Rathfelder,

Multnomah County received a public records request from you on October 09, 2025. You requested the following: I respectfully request copies of all public records in the County's possession related to the engagement process with external stakeholders in the development of the 2025 Draft Climate Justice Plan. After several conversations with County staff and confirmation from the Board of Commissioners, it is clear there was an extensive engagement process between Multnomah County and members of the Steering Committee as well as specific members of the public invited to the engagement processes' public meetings. This engagement process (as outlined from pages 21-25 of the draft Climate Justice report and as specifically highlighted on page 13 of the Sept 18, 2025 Commission presentation) was not shared transparently with the broader public at the time it was happening, and newly engaged stakeholders need to have the same information that was shared previously in order to appropriately engage the next part of the process now. Therefore, we would expect that documentation from a public engagement process will now be made available to stakeholders and interested members of the public alike at no cost. Again, we are specifically requesting those items employed in the engagement process, including but are not limited to: all information provided by the County and resulting from "workshops, webinars, open houses, informational meetings" like meeting agendas, meeting notes, public surveys/survey results, visuals and technical information provided during past public meetings/open houses, documentation of the promotion of the public meetings). We ask for the documentation as soon as possible as the County has scheduled a new set of public forum based on the past engagement process but newly engaged stakeholders have not yet been allowed to review past engagement process materials.

Thank you for responding to our email from 10/21. I need to speak with Sustainability regarding the additional questions you are asking. Can you please specify what exactly you are still looking for regarding records? I want to make sure I do not miss anything.

Sincerely,
Multnomah County
Communications

June 2026: Still awaiting fulfillment of original request